

Comments in Response to Localism Notice of Proposed Rulemaking  
MB Docket No. 04-233

Received & Inspected  
MAR 12 2008  
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FCC Mail Room

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so – even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.

Brenda S. Williams

Signature

3/10/08  
Date

BRENDA S. WILLIAMS

Name

312 BRANDYWINE Rd.  
Address

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Phone

\_\_\_\_\_  
Title (if any)

\_\_\_\_\_  
Organization (if any)

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MAR 17 2008

TO: The Secretary, Federal Communications Commission  
12<sup>th</sup> Street NW.  
Washington, DC 20554 Attn: Chief, Media Bureau

FCC Mail Room

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- (a) by requiring staff presence whenever a station is on the air and,
- (b) by further restricting main studio location choices.

Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.

Terril B Richardson

Signature

Terril B Richardson

Name

218 Reds Rd

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Greenwood, SC 29649

Date 3-8-08

Phone 889-9138

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Title (if any) \_\_\_\_\_

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To whom it may concern;

If enacted, the proposals could force Christian radio programmers to either compromise their messages by including input from those who do not share the same values, or to run the risk of costly, long & potentially ruinous government inquiries.

This proposal could also drive up the cost of providing Christian radio by requiring stepping; even if all programming is delivered by satellite.

Please don't allow rules that violate our First Amendment.

Thank you for your consideration.

Sincerely,  
Karen E. Robinson

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Dear Sirs - I completely agree with the following statement

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Margaret Sue Oakley  
Signature

3/10/08  
Date

Margaret Sue Oakley  
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